2011 & 2014 EDITION CEHRT FLEXIBILITY ATTESTATION GUIDE FOR ELIGIBLE PROFESSIONALS AND ELIGIBLE HOSPITALS

Medicare Electronic Health Record

(EHR) Incentive Program

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Overview

The Centers for Medicare & Medicaid Services (CMS) and the Office of the National Coordinator for Health Information Technology (ONC) released a final rule in August 2014 that grants flexibility for providers who are unable to fully implement 2014 Edition certified electronic health record (EHR) technology (CEHRT) for the 2014 reporting year. Providers may use EHRs that have been certified under the 2011 Edition, 2014 Edition, or a combination of the 2011 and 2014 Editions to submit meaningful data for an EHR reporting period in 2014.

Providers will be required to report using 2014 Edition CEHRT beginning in 2015.

This guide will provide an overview of the CEHRT flexibility steps in the CMS Registration and Attestation System. The CEHRT flexibility options begin at Step 5 of the attestation process for eligible hospitals or Step 6 of the attestation process for eligible professionals.

Reporting Options for 2014

The 2014 reporting options based on the Edition of EHR certification are below:

2011 Edition CEHRT

If you are scheduled to report Stage 1 or Stage 2:

- 2013 Stage 1 objectives and 2013 CQMs

Combination of 2011 & 2014 Edition CEHRT

If you are scheduled to report Stage 1:

- 2013 Stage 1 objectives and 2013 CQMs; or
- 2014 Stage 1 objectives and 2014 CQMs

If you are scheduled to report Stage 2:

- 2013 Stage 1 objectives and 2013 CQMs; or
- 2014 Stage 1 objectives and 2014 CQMs; or
- Stage 2 objectives and 2014 CQMs

2014 Edition CEHRT

If you are scheduled to report Stage 1:

- 2014 Stage 1 objectives and 2014 CQMs

If you are scheduled to report Stage 2:

- 2014 Stage 1 objectives and 2014 CQMs; or
- Stage 2 objectives and 2014 CQMs

CEHRT Flexibility Attestation Process

To begin the attestation process, log in to the CMS Registration and Attestation System.

Eligible professionals should input their Identity & Access Management (I&A) ID and password to log in to the attestation system. Eligible hospitals should input their National Provider Identifier (NPI), as well as a user ID and password.

Once logged in, determine which EHR Edition you will report for the 2014 reporting year. The scenarios are below:

1. 2011 Edition CEHRT for first-year providers in Stage 1

2. 2011 Edition CEHRT for providers beyond their first year

3. 2014 Edition CEHRT for providers in Stage 1

4. 2014 Edition CEHRT for providers in Stage 2

5. Combination of 2011 and 2014 Edition CEHRT for providers in Stage 1 or Stage 2

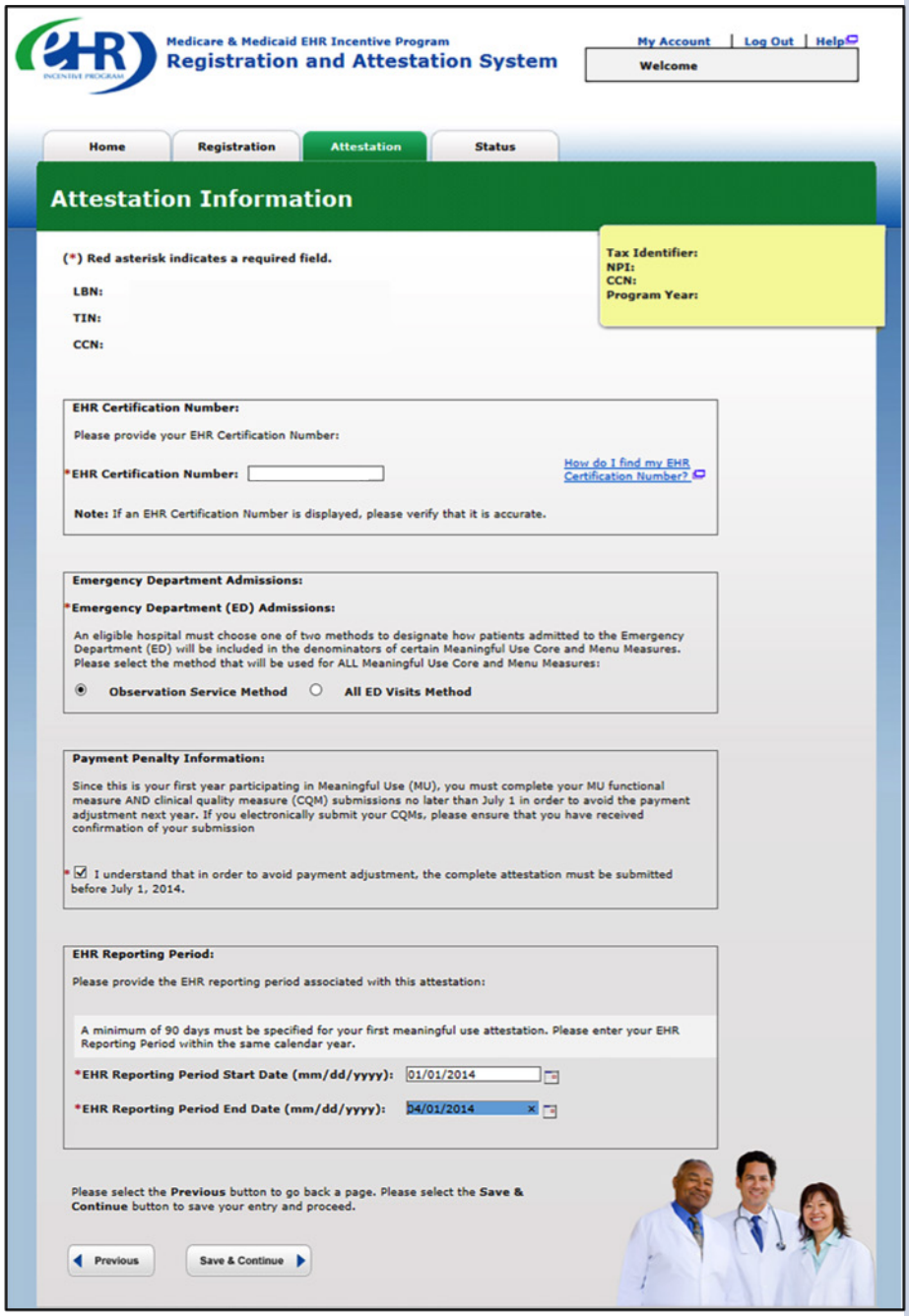
6. Making System Modifications
   A. Changing 2014 Edition CEHRT number to 2011 Edition CEHRT number
   B. Updating the Definition selection associated with a hybrid Edition CEHRT

7. Batch Attestation Upload Changes for Stage 1 or Stage 2

Scenario #1: 2011 Edition CEHRT for First-Year Providers

This reporting option is only available for providers attesting for their first year of meaningful use. Providers only need to enter 2013 Stage 1 meaningful use data for a 90-day reporting period.

Providers are not able to electronically report clinical quality measures (CQMs) under this option.



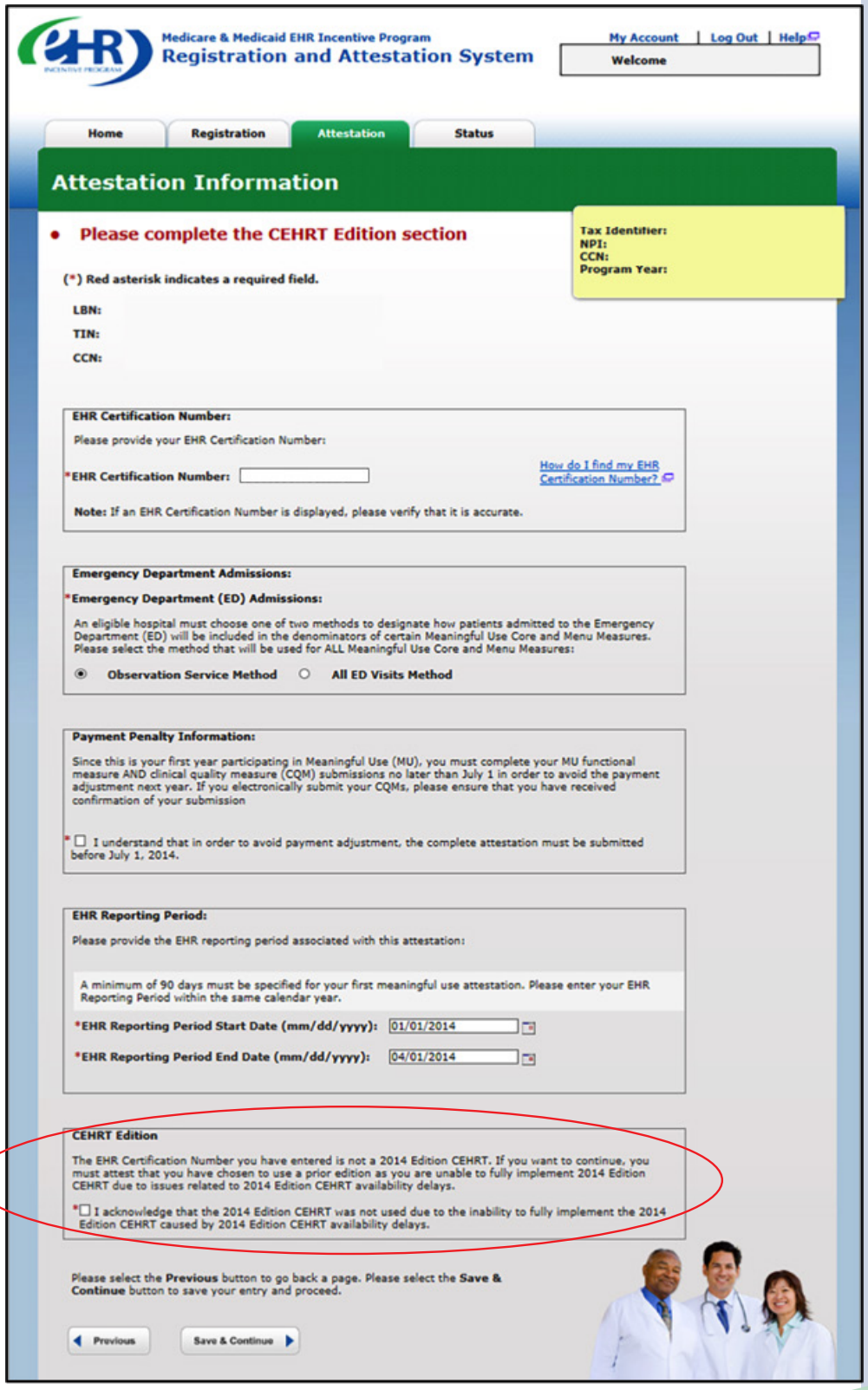
STEPS

Enter your 2011 Edition CEHRT Number in the EHR Certification Number box

Enter your 90-day EHR reporting period

Click *Save & Continue* button

Scenario #1: 2011 Edition CEHRT for First-Year Providers (continued)



STEPS

After clicking the *Save & Continue* button, a CEHRT Edition Acknowledgement Statement will appear

Review and accept the statement

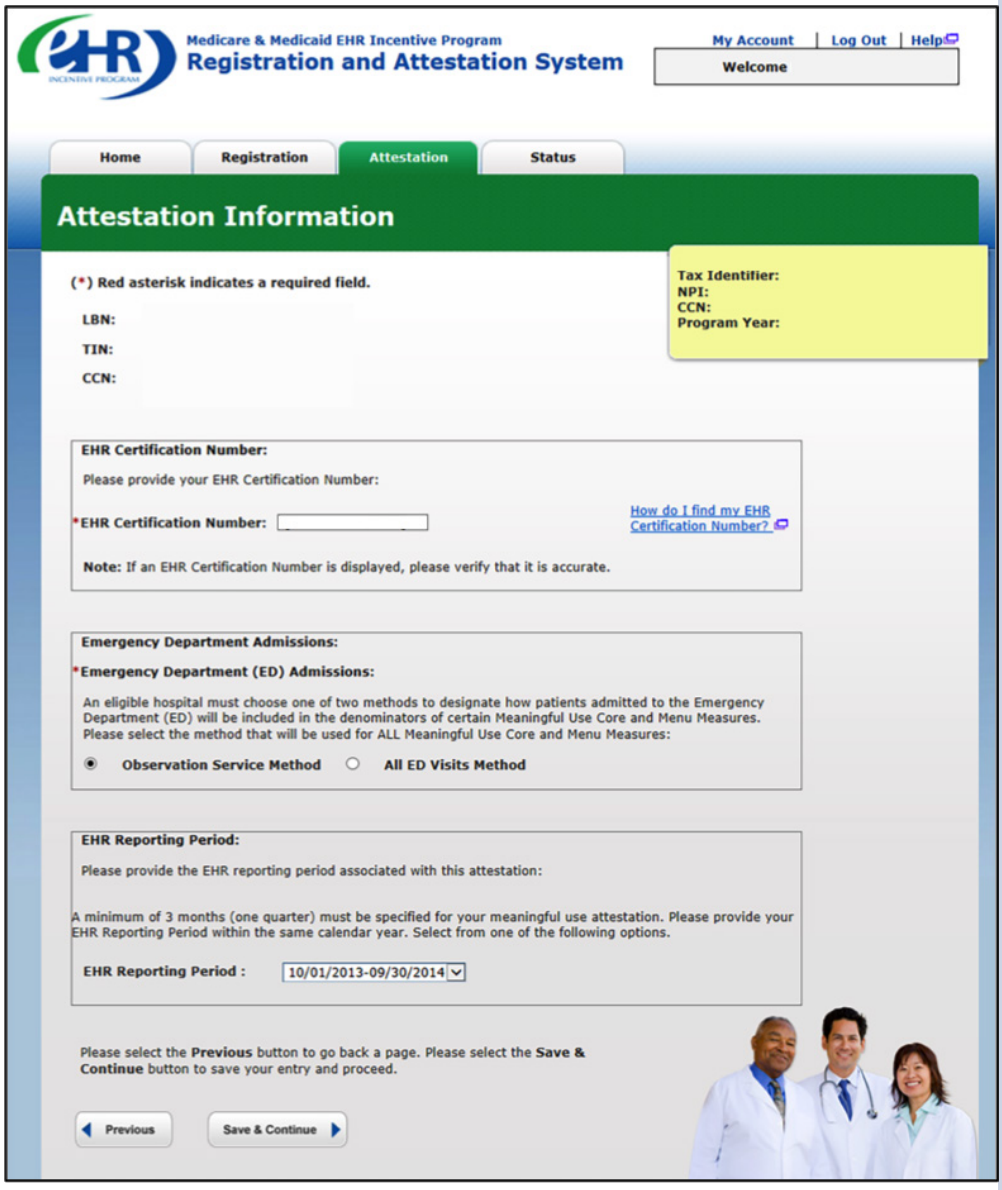
Click the *Save & Continue* button

Begin inputting your attestation information for the Core and Menu Measures and continue through the attestation process

Scenario #2: 2011 Edition CEHRT for Providers Beyond their First Year of Meaningful Use

This reporting option is available for providers beyond their first year of meaningful use who were unable to report using a 2014 Edition CEHRT. Providers can report 3 month's or a full year of 2013 Stage 1 meaningful use data with a 2011 Edition CEHRT.

Providers are not able to electronically report clinical quality measures (CQMs) under this option.



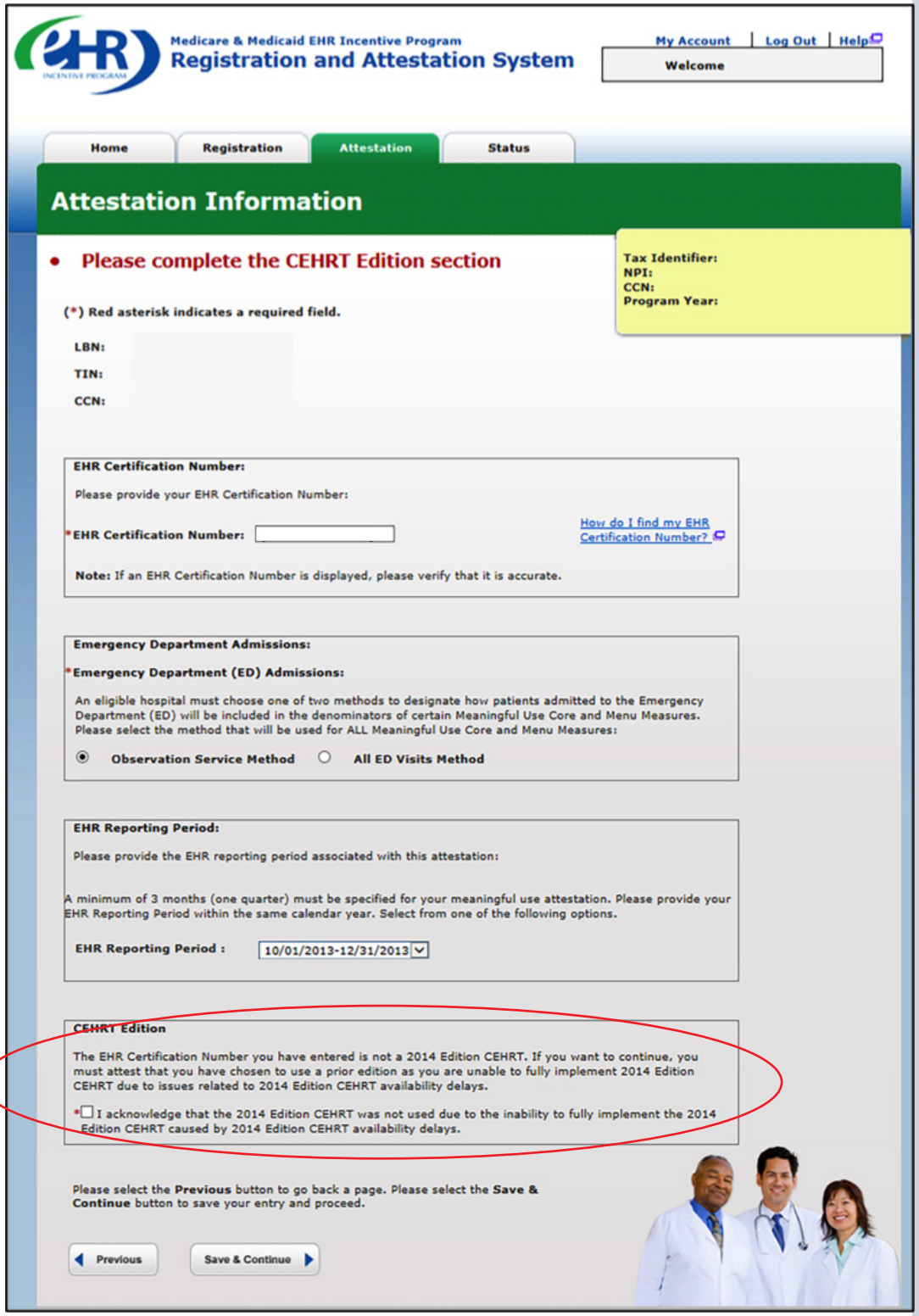
STEPS

Enter your 2011 Edition CEHRT Number in the EHR Certification Number box

Enter your 3-month or full year reporting period

Click *Save & Continue* button

Scenario #2: 2011 Edition CEHRT for Providers Beyond their First Year of Meaningful Use (continued)



STEPS

After clicking the *Save & Continue* button, a CEHRT Edition Acknowledgement Statement will appear

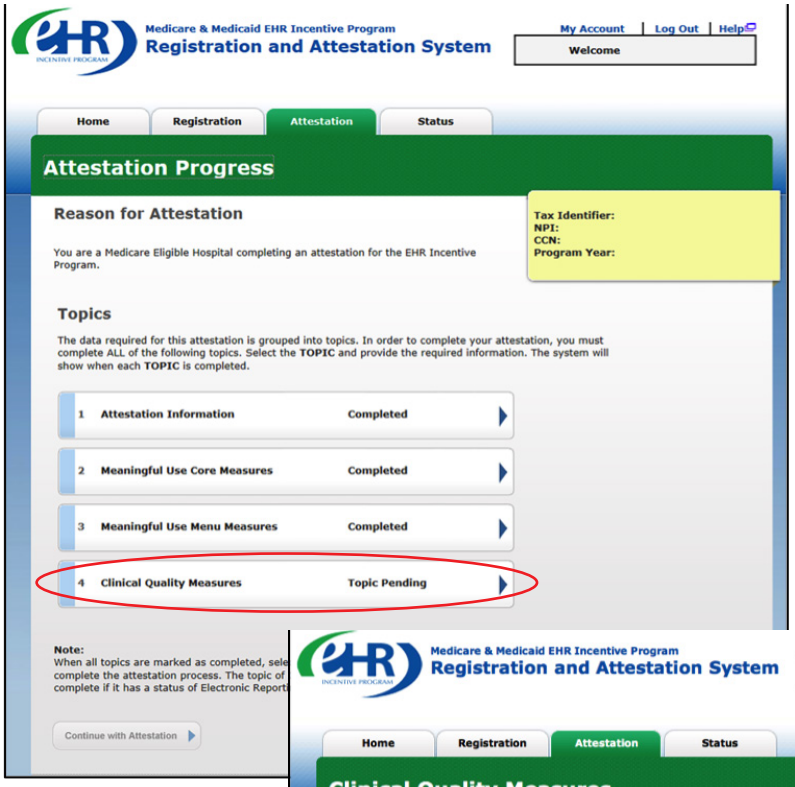
Review and accept the statement

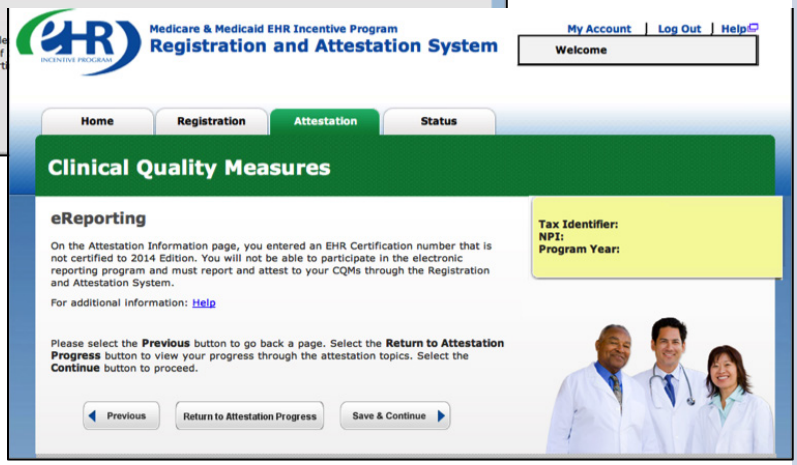
Click the *Save & Continue* button

Scenario #2: 2011 Edition CEHRT for Providers Beyond their First Year of Meaningful Use (continued)

Providers will not be able to electronically report CQMs with 2011 Edition CEHRT, and will instead need to report and attest to them through the Registration and Attestation System.

The change to this screen only applies to providers in program year 2014 for when they enter a CEHRT Edition number on the Attestation Information page that is certified to the 2011 Edition or 2013 Hybrid Edition and is attesting to the 2013 Stage 1 definition.

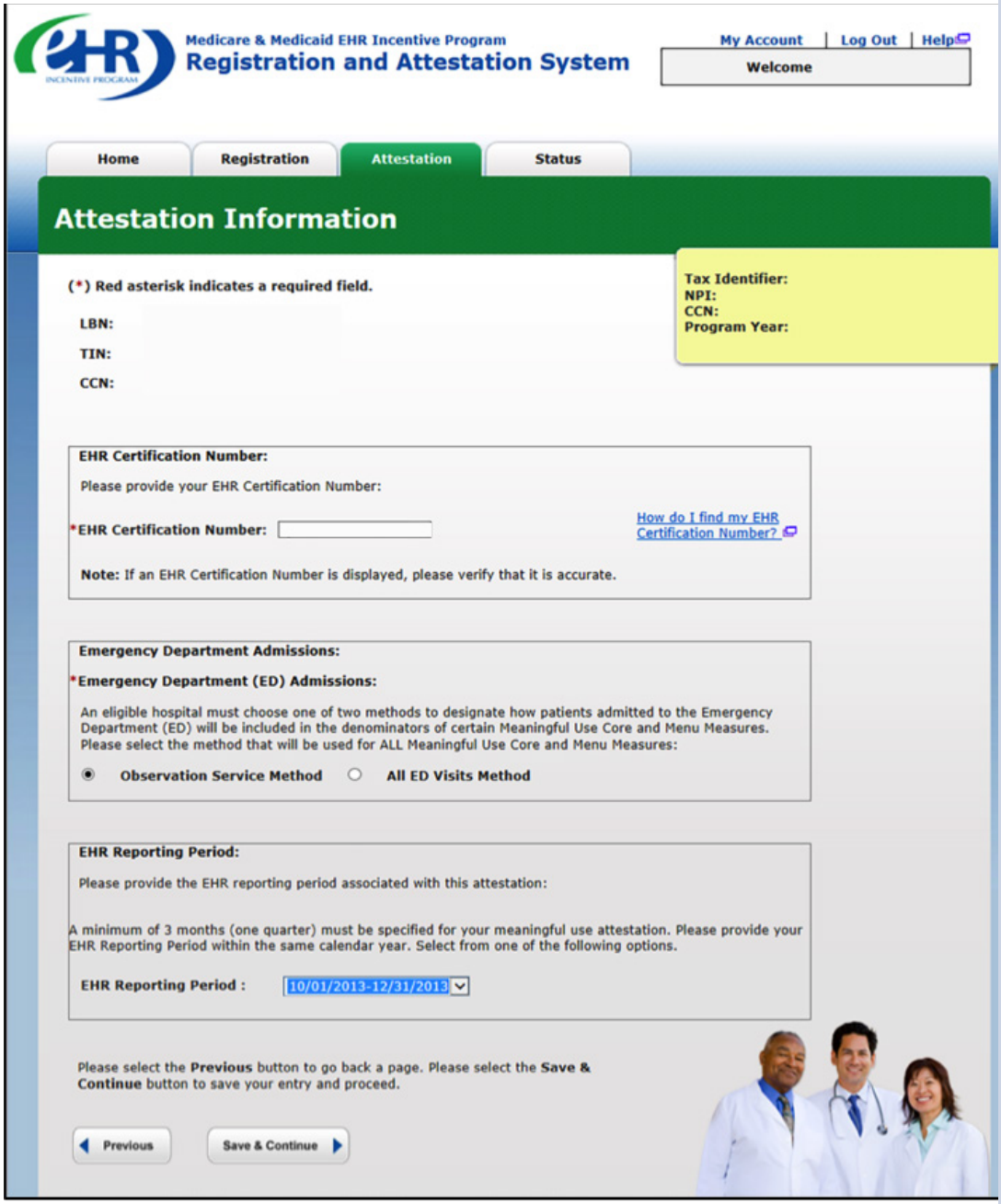




Scenario #3: 2014 Edition CEHRT for Providers in Stage 1

This reporting option is available for providers attesting to 2014 Stage 1 of meaningful use with a 2014 Edition CEHRT. For 2014 only, all Medicare providers beyond their first year of participation are required to demonstrate meaningful use for a 3-month EHR reporting period. Providers can also choose to report a full year of meaningful use data.

Providers with 2014 Edition CEHRT can also choose to electronically report their clinical quality measures (CQMs).



STEPS

Enter your 2014 Edition CEHRT Number in the EHR Certification Number box

Enter your 3-month or full year reporting period

Click the *Save & Continue* button

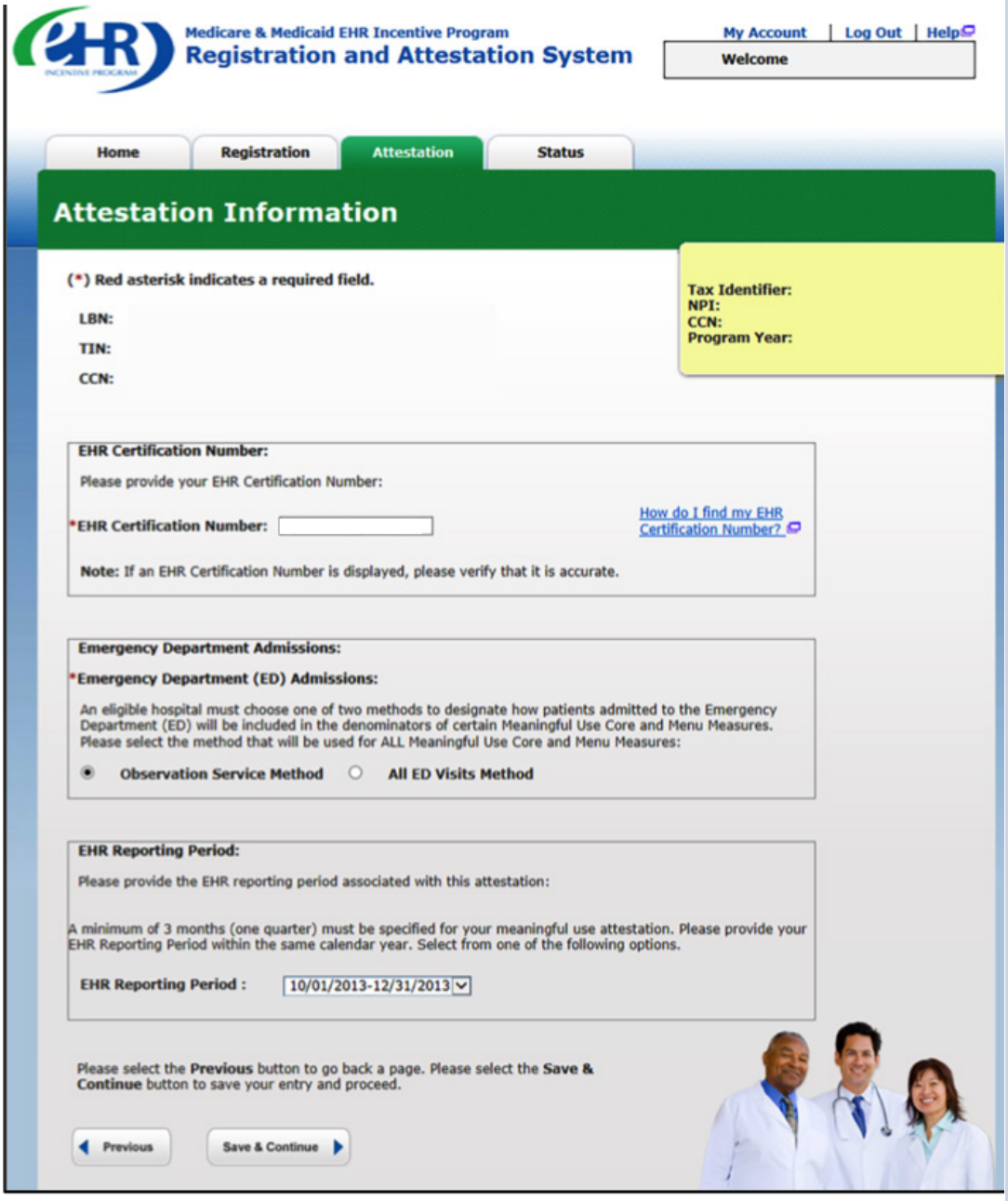
Begin inputting your attestation information for the Core and Menu Measures and continue through the attestation process

Scenario #4: 2014 Edition CEHRT for Providers in Stage 2

This reporting option is available to providers scheduled to attest to Stage 2 of meaningful use with 2014 Edition CEHRT. For 2014 only, all Medicare providers beyond their first year of participation are required to demonstrate meaningful use for a 3-month EHR reporting period in 2014. Providers can also choose to report a full year of meaningful use data. Providers scheduled to attest to Stage 2 who have been unable to fully implement their 2014 Edition CEHRT also have the option of reporting 2014 Stage 1 meaningful use.

Providers can also electronically report their Clinical Quality Measures.

If the provider is in Stage 2 in program year 2014, clicking the 'Save and Continue' button will refresh the same page and display the option to select either Stage 1 or Stage 2.



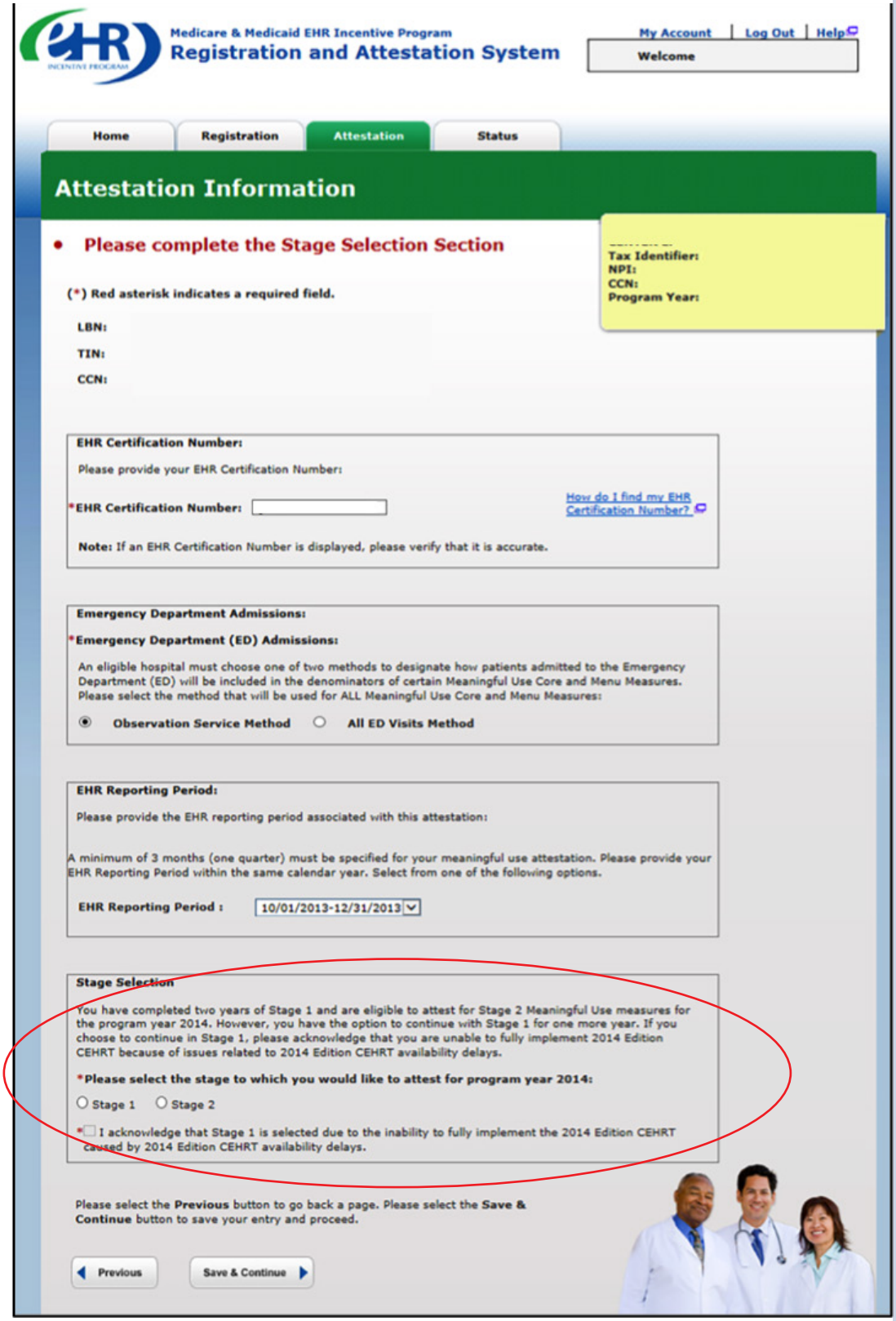
STEPS

Enter your 2014 Edition CEHRT Number in the EHR Certification Number box

Enter your 3-month or full year reporting period

Click the *Save & Continue* button

Scenario #4: 2014 Edition CEHRT for Providers in Stage 2 (continued)



STEPS

After clicking the *Save & Continue* button, a Stage Selection box will appear

Select Stage 2 or 2014 Stage 1 and check that you have reviewed the acknowledgement statement if you choose 2014 Stage 1

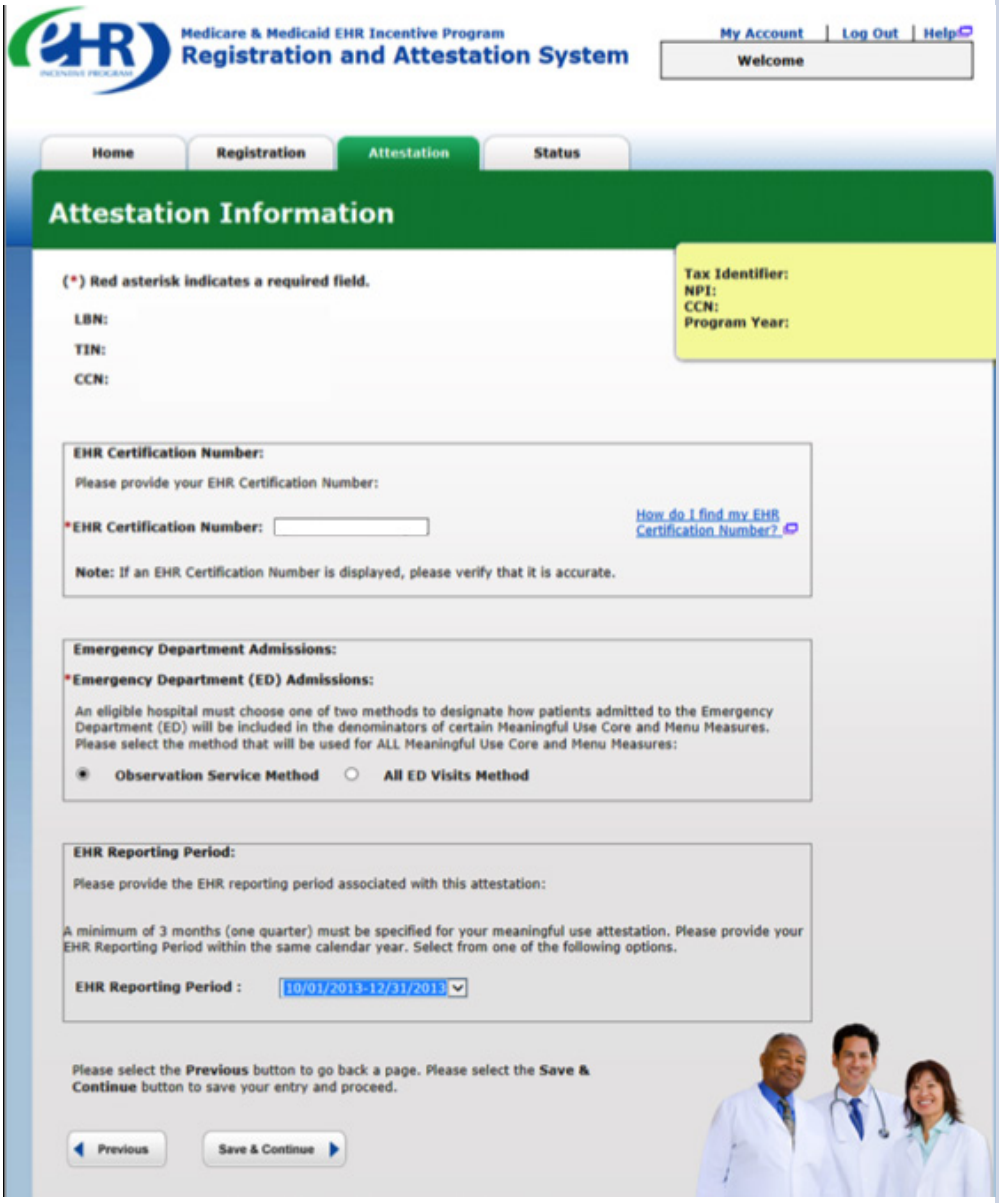
Click the *Save & Continue* button

Clicking the *Save & Continue* button will save the attestation and display the first core measure of the selected stage.

Scenario #5: Combination of 2011 and 2014 Edition CEHRT

This reporting option allows providers to use a hybrid of 2011 Edition and 2014 Edition CEHRT. Medicare providers beyond their first year of participation must report 3 month's of meaningful use data for 2014. Providers can also choose to report a full year of meaningful use data. The reporting options include:

- If you are scheduled to report Stage 1:
  - 2013 Stage 1 objectives and 2013 CQMs; or
  - 2014 Stage 1 objectives and 2014 CQMs
- If you are scheduled to report Stage 2:
  - 2013 Stage 1 objectives and 2013 CQMs; or
  - 2014 Stage 1 objectives and 2014 CQMs; or
  - Stage 2 objectives and 2014 CQMs



STEPS

Enter your hybrid CEHRT Number in the EHR Certification Number box

Enter your 3-month or full year reporting period

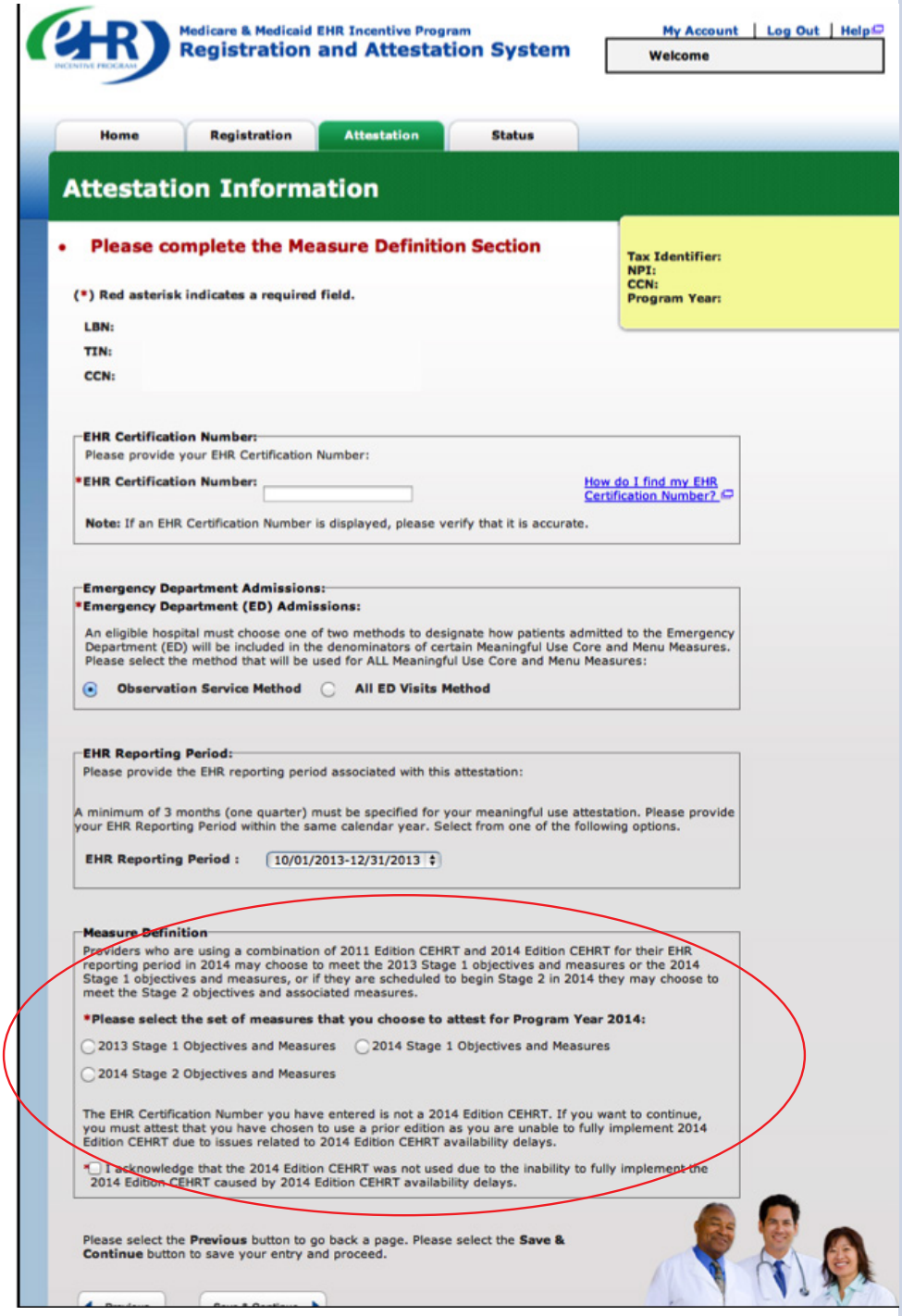
Click the *Save & Continue* button

If a 2013 Hybrid Edition CEHRT number is entered, clicking the *Save & Continue* button on the Attestation Information page refreshes the same page and displays the CEHRT Edition section AND the *Definition Selection* section.

Scenario #5: Combination of 2011 and 2014 Edition CEHRT (continued)

Note: The options for 'Measure Definition' are dynamic. The '2014 Stage 2 objectives and measures' option will be available only if providers have been identified as being in Stage 2.

Clicking 'Save and Continue' on the Attestation Information page will save the attestation and allow providers to attest to the selected definition of measures.



STEPS

Upon clicking the 'Save & Continue' button, you will see a Measure Definition Section displayed

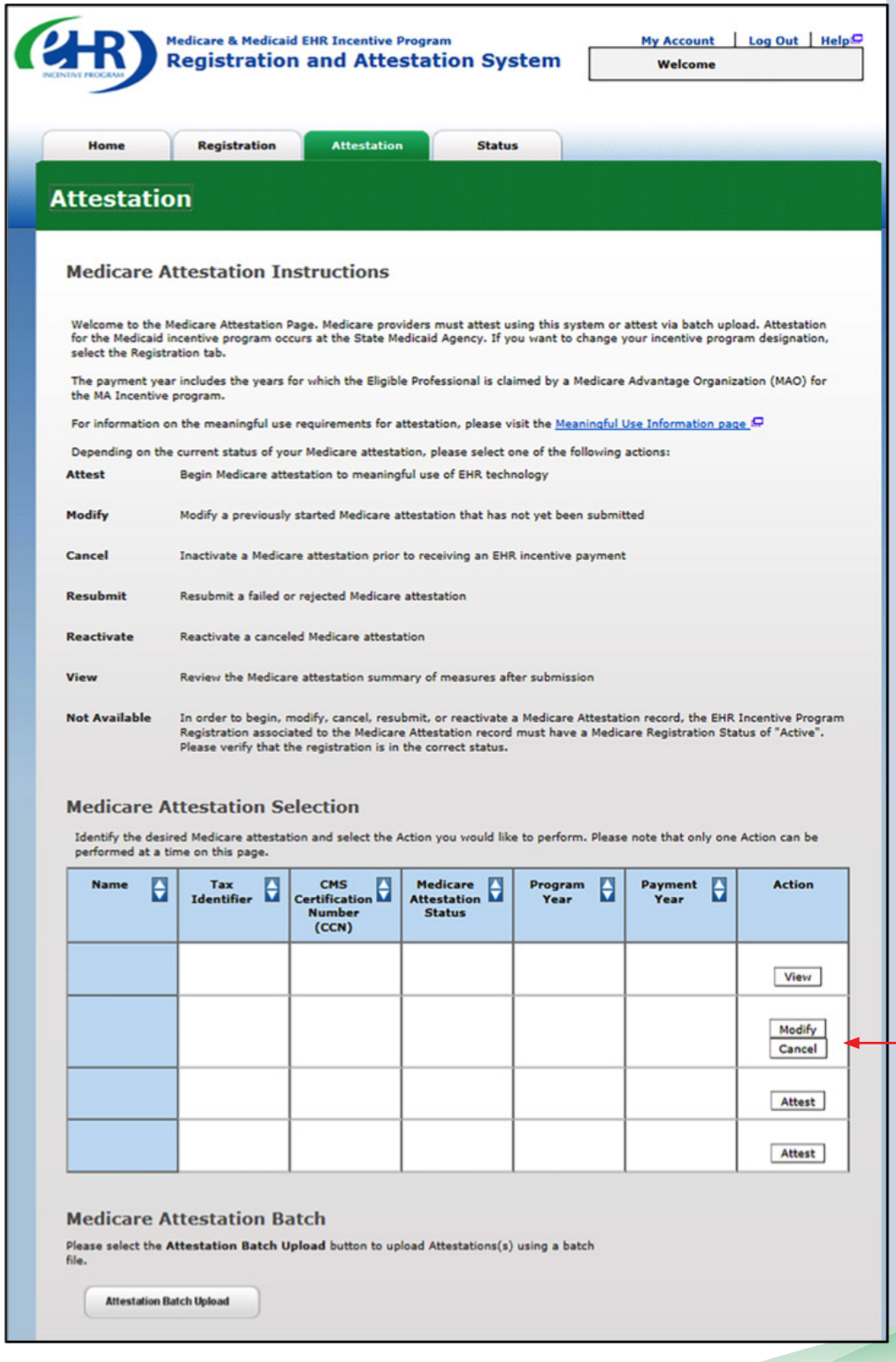
Please select one of the following Measure Definition Selections below:

- 2013 Stage 1 Objectives and Measures
- 2014 Stage 1 Objectives and Measures
- 2014 Stage 2 Objectives and Measures (Note: this option will only be displayed if you are scheduled to demonstrate Stage 2)

Click the *Save & Continue* button

Scenario #6A: Making System Modifications: 2014 Edition CEHRT number to 2011 Edition CEHRT number

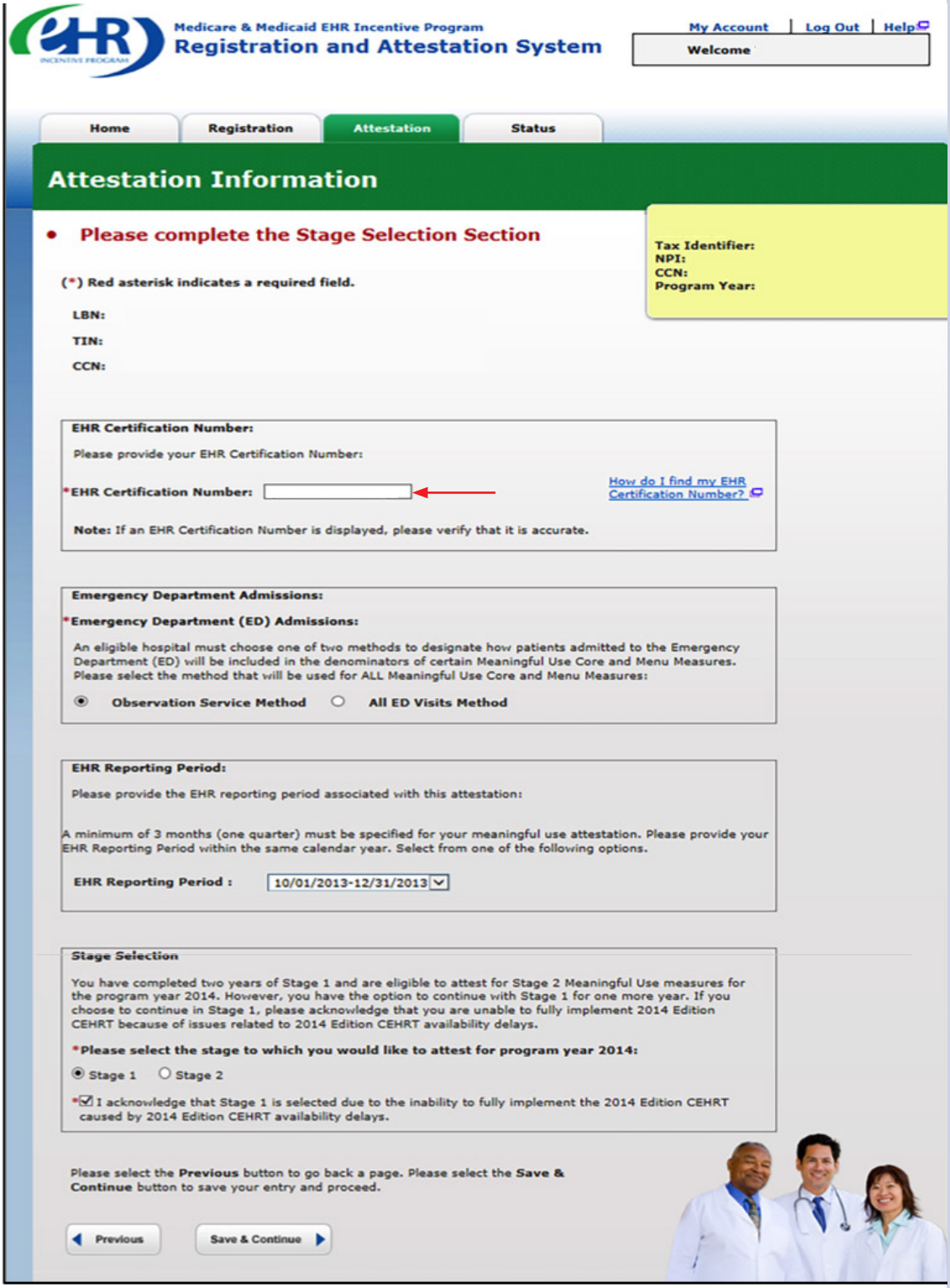
This reporting option is for providers who were scheduled to meet Stage 2 requirements, but were unable to fully implement their 2014 Edition CEHRT. Providers will change their 2014 Edition CEHRT number to a 2011 Edition CEHRT number.



STEPS

If you wish to change your 2014 Edition CEHRT to 2011 Edition CEHRT, click the *Modify* button on the Attestation page

Scenario #6A: Making System Modifications: 2014 Edition CEHRT number to 2011 Edition CEHRT number (continued)



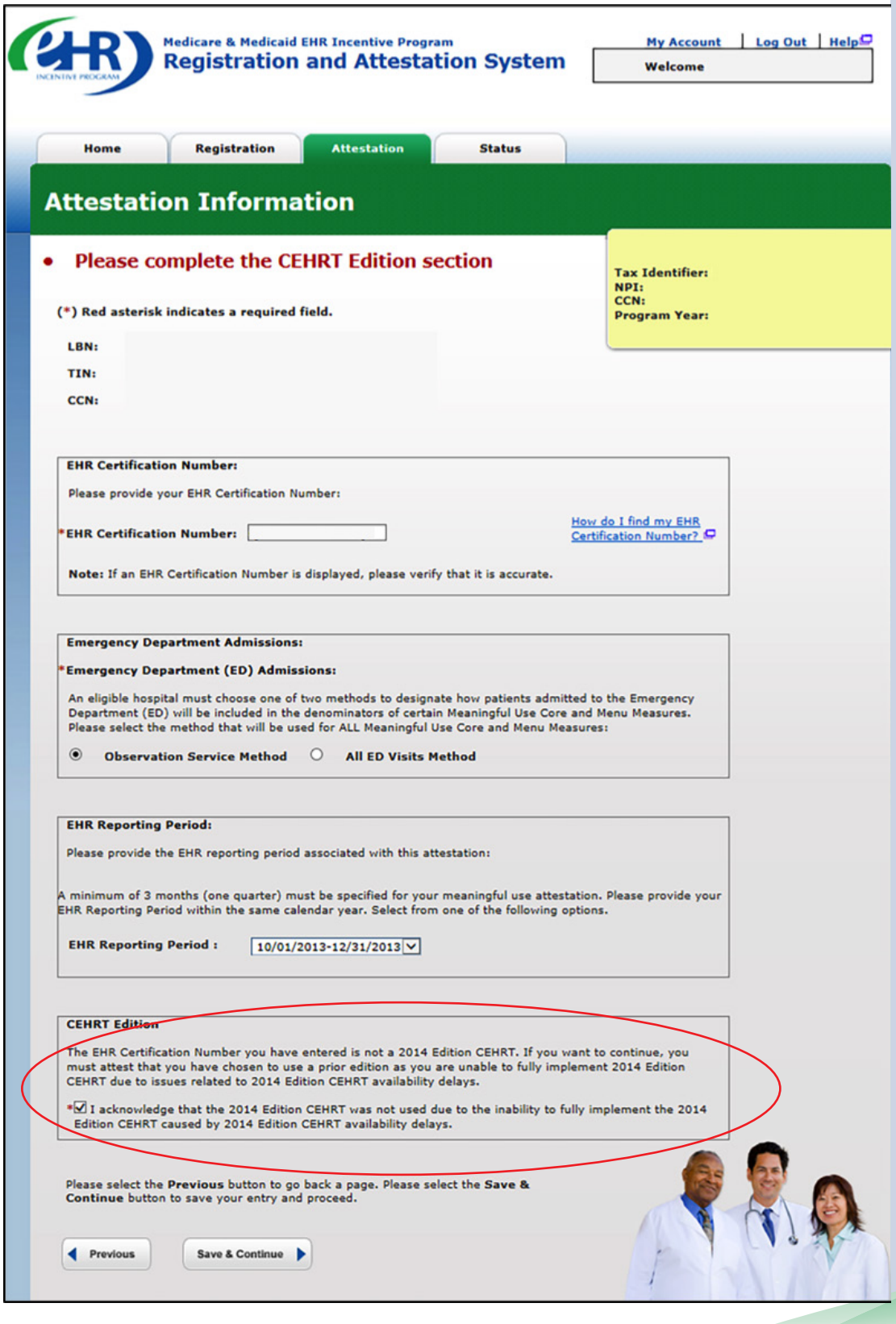
STEPS

You will see your 2014 Edition CEHRT number in the CEHRT number box

To change your Edition CEHRT, enter your 2011 Edition CEHRT number in the CEHRT number box

Click the *Save & Continue* button

Scenario #6A: Making System Modifications: 2014 Edition CEHRT number to 2011 Edition CEHRT number (continued)

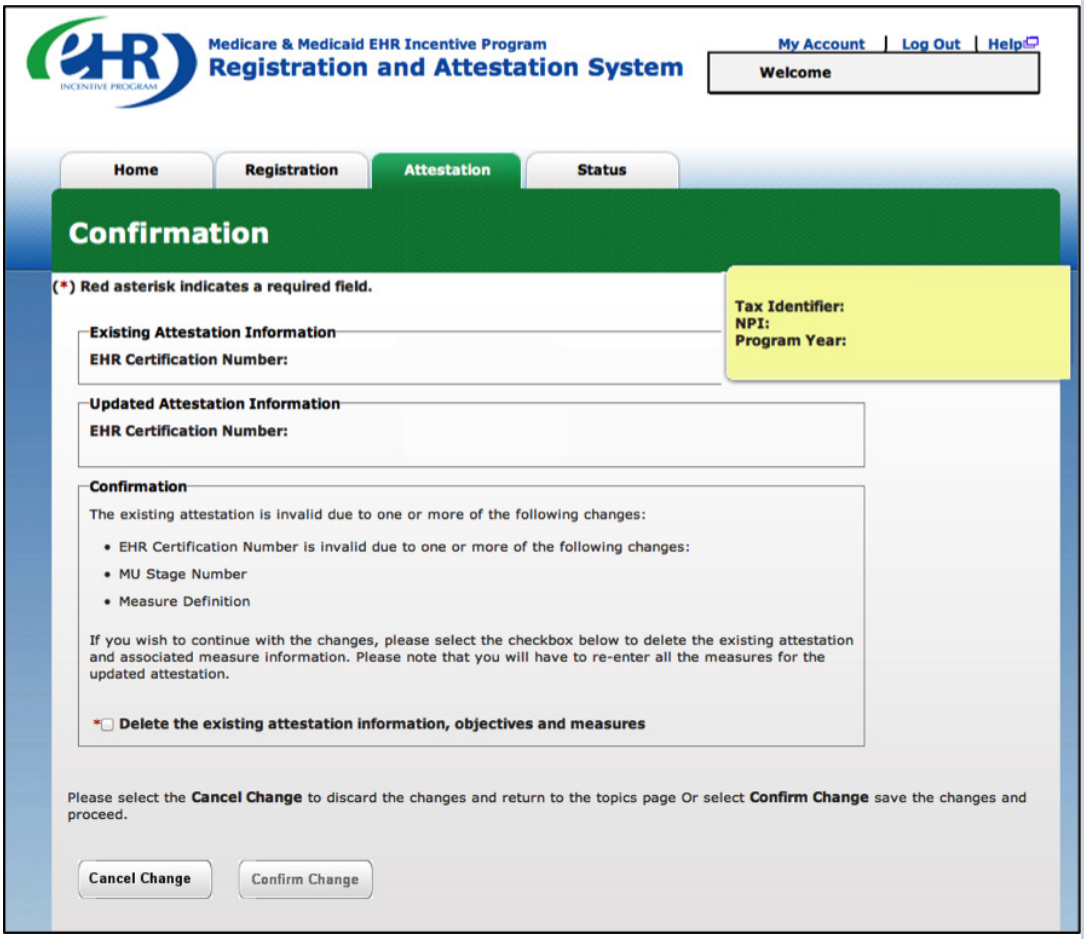


STEPS

Review the CEHRT Edition information in the highlighted box and check the box acknowledging that you were unable to fully implement 2014 Edition CEHRT due to issues related to 2014 Edition CEHRT availability delays

Click the *Save & Continue* button

Scenario #6A: Making System Modifications: 2014 Edition CEHRT number to 2011 Edition CEHRT number (continued)



STEPS

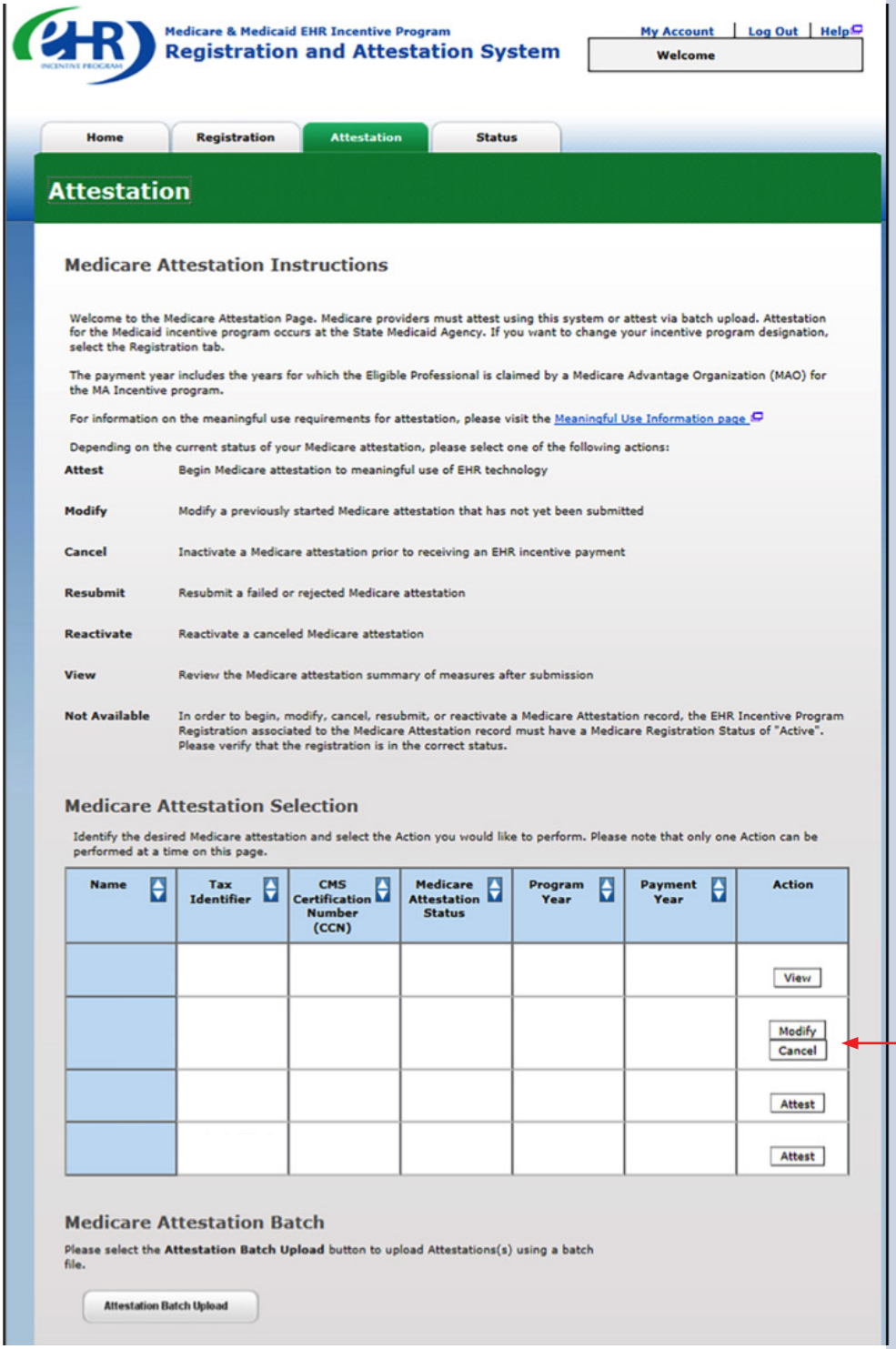
Confirm or Cancel this change:

- If you confirm the change, the attestation will be overwritten with the new change

- If you cancel the change, the attestation changes will be discarded and the topics page will be displayed

Scenario #6B: Making System Modifications: 2014 Stage 1 Definition to 2013 Stage 1 Definition

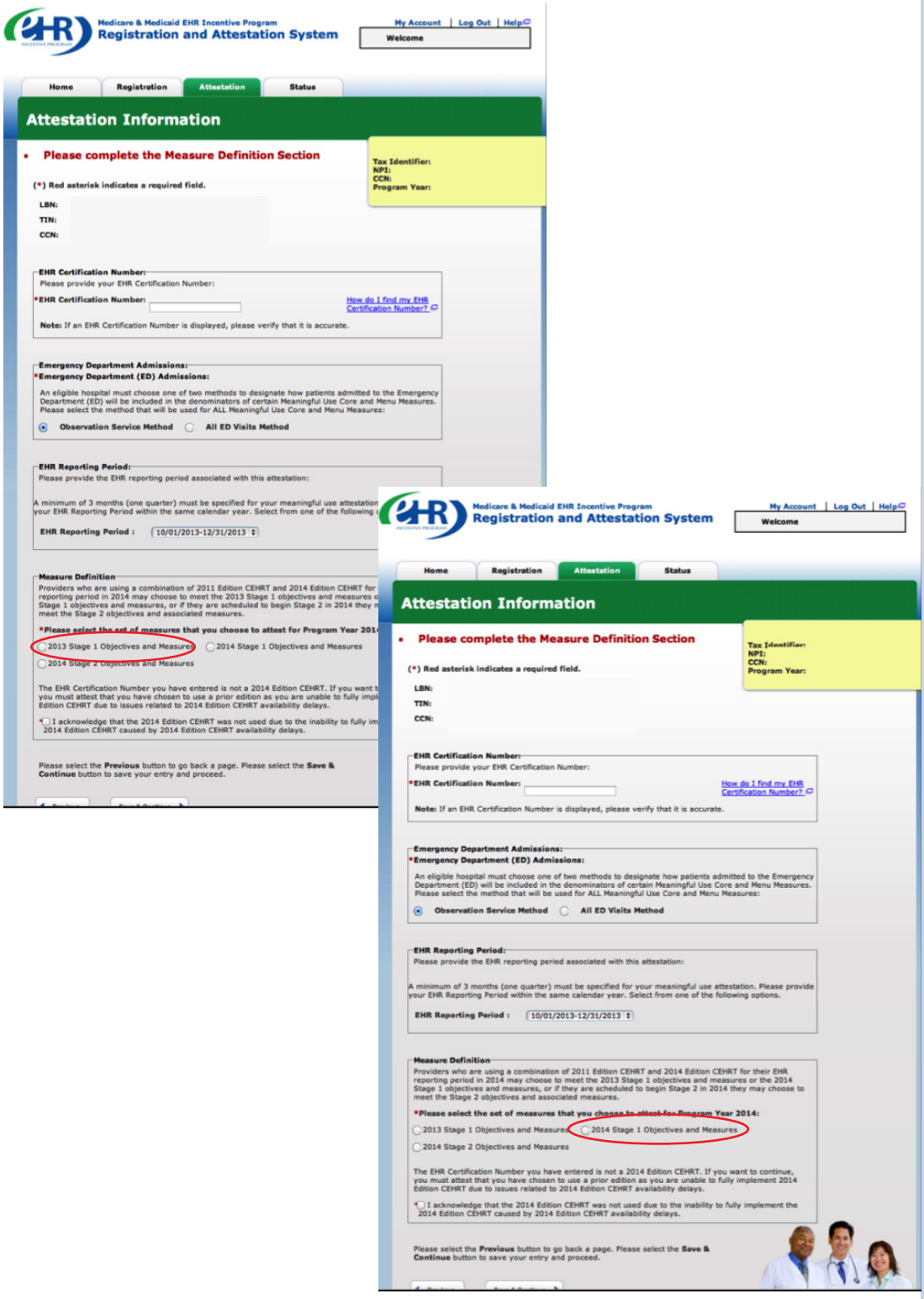
Providers using a combination of 2011 Edition CEHRT and 2014 Edition CEHRT for the 2014 reporting year may choose to meet the 2013 Stage 1 objectives and measures or the 2014 Stage 1 objectives and measures.



STEPS

If you who wish to change your 2014 Stage 1 Definition to 2013 Stage 1 Definition, click the *Modify* button on the Attestation page

Scenario #6B: Making System Modifications: 2014 Stage 1 Definition to 2013 Stage 1 Definition (continued)



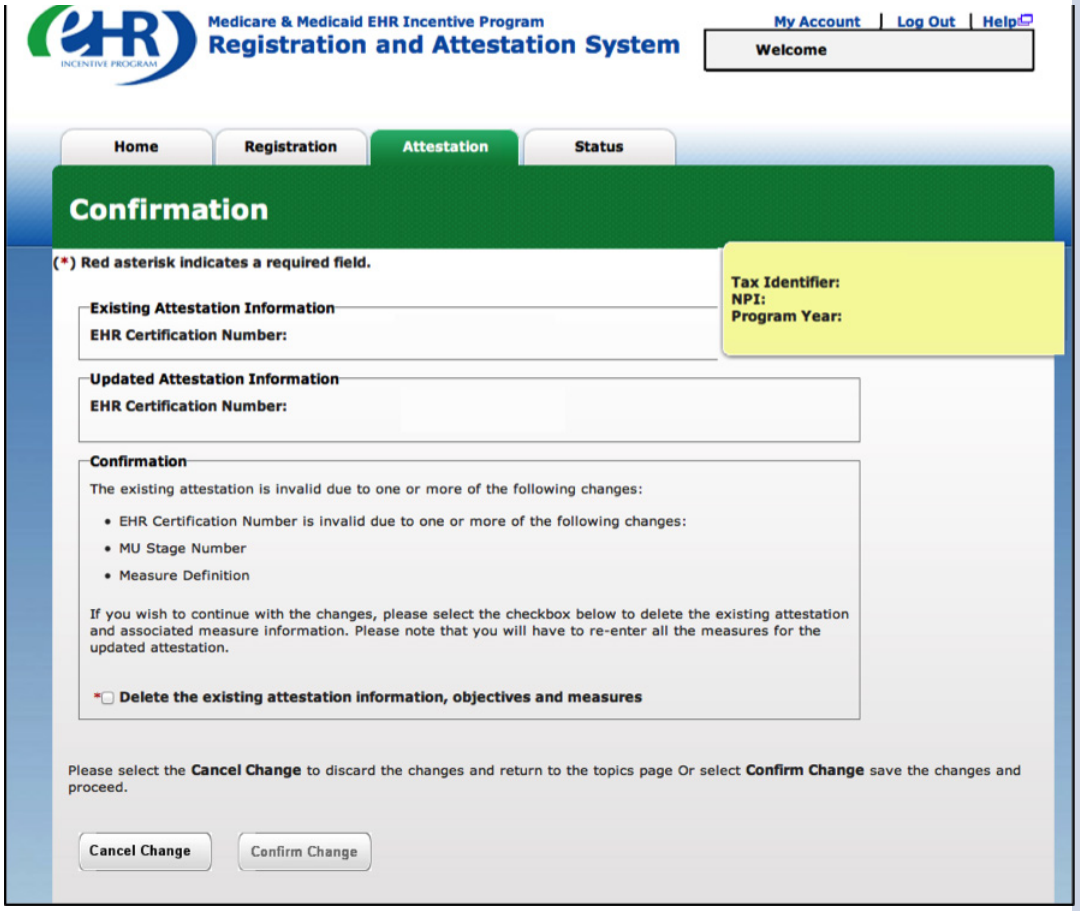
STEPS

You will see your current Stage 1 Definition option highlighted in the Measure Definition box

Change your definition based on your 2014 reporting options

Click the *Save & Continue* button

Scenario #6B: Making System Modifications: 2014 Stage 1 Definition to 2013 Stage 1 Definition (continued)



STEPS

Confirm or Cancel this change:

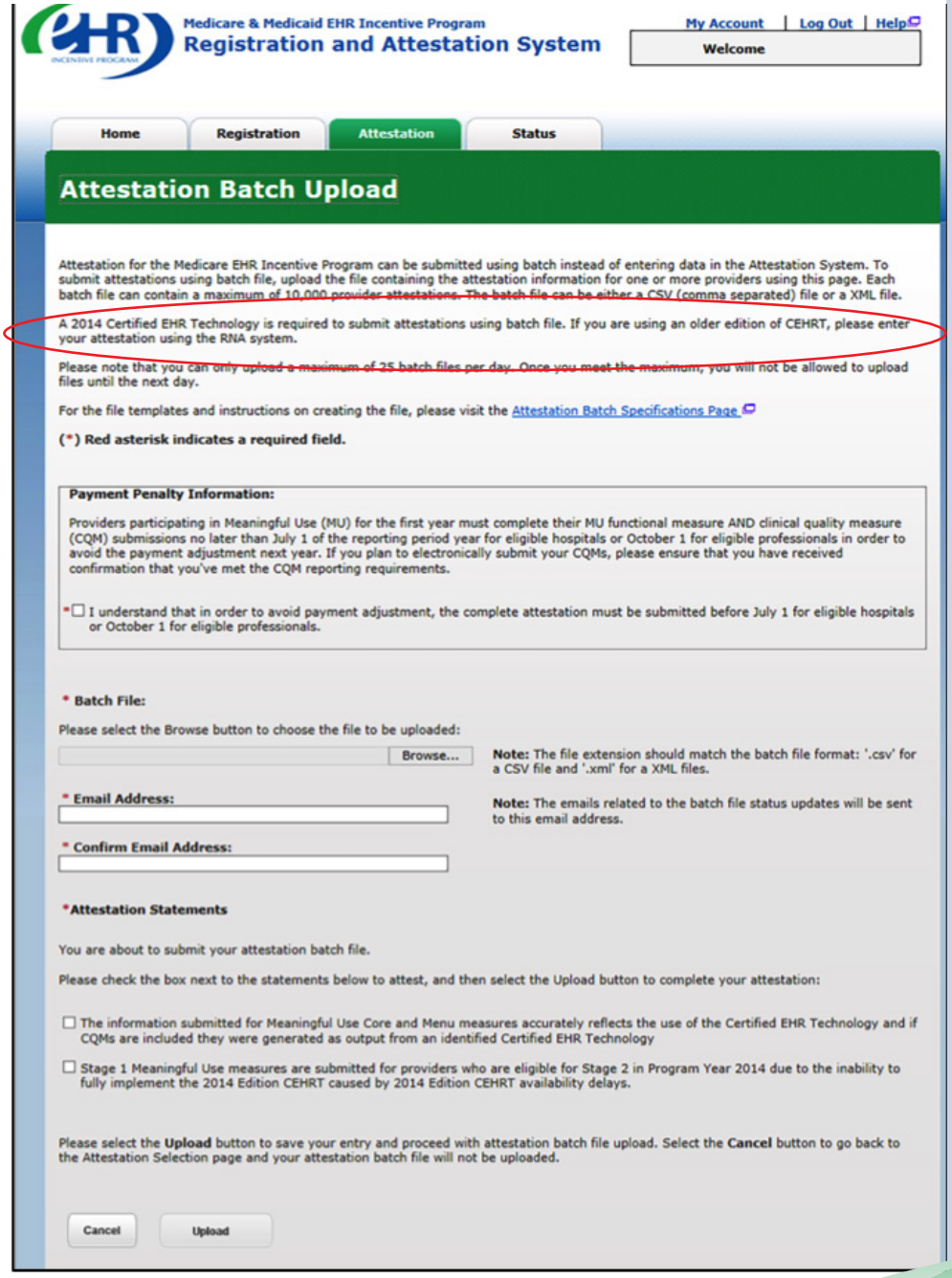
- If you confirm the change, the attestation will be overwritten with the new change
- If you cancel the change, the attestation changes with be discarded and the topics page will be displayed

Scenario #7: Batch Attestation Upload

The Attestation Batch Upload option allows multiple eligible professionals or multiple eligible hospitals to submit attestations in a single file through the CMS Registration and Attestation System.

Only 2014 Edition CEHRT is able to submit batch attestations. If you are using a 2011 Edition CEHRT, you must enter your attestation information individually through the CMS Registration and Attestation System.

If 2014 Stage 1 meaningful use measures are submitted for providers who are eligible for Stage 2 in program year 2014 due to the inability to fully implement the 2014 Edition CEHRT caused by 2014 Edition CEHRT availability delays, accepting the corresponding attestation statement is required.



STEPS

Upload the batch file to the CMS Registration and Attestation system

Input your email address

Review and accept the Attestation Statement(s)

Click the *Upload* button

Continue through the Registration and Attestation System

Additional Information

Based on the 2014 reporting options, please visit the following Attestation User Guides for a step-by-step overview of the CMS attestation process:

Providers reporting using 2014 Edition CEHRT:

- Stage 1 Attestation User Guide for Medicare Eligible Professionals
- Stage 1 Attestation User Guide for Eligible Hospitals and CAHs
- Stage 1 Eligible Professional Attestation Worksheet (2014 Edition)
- Stage 1 Eligible Hospital and CAH Attestation Worksheet (2014 Edition)

Providers reporting using 2011 Edition CEHRT or a combination of 2011 and 2014 Edition CEHRT:

- Stage 1 Attestation User Guide for Eligible Professionals (2013 Definition)
- Stage 1 Eligible Professional Attestation Worksheet (2013 Definition)
- Stage 1 Eligible Hospital and CAH Attestation Worksheet (2013 Definition)

Additional Resources

- Batch User Guide
- CMS Registration and Attestation Webpage